



September 17, 2020

Ms. Mary Walker
Administrator, Region IV
USEPA REGION 4
61 Forsyth Street, S.W.
Mail Code: 9T25
Atlanta, GA 30303-8960

**Subject: Gasification Project
Synergy Solutions of Crisp County, LP
155 Landfill Road
Cordele, Georgia 31015**

Dear Ms. Walker,

I am writing to you today in regards to our ongoing efforts at Synergy Solutions to operate a new Coaltech Gasification unit at our facility in Cordele, GA. Synergy Solutions is a Municipal Recycling Facility with a strong focus toward innovation. Our corporate goals are to not only responsibly manage municipal recycling, but to also conduct research, development and demonstration of new technologies that support environmentally responsible, sustainable solutions for the waste management and recycling industry. Approximately 5 years ago we set out to install a Coaltech Gasification Unit in our facility to compliment a new technology (Burcell®) we were bringing to the waste management industry. This new Burcell® technology enables ~95% of the organic fraction to be separated from MSW streams and diverted from landfilling by transforming it into a recycled carbon rich BioChar product utilizing the tightly controlled gasification technology afforded by the Coaltech design.

We submitted a request to permit the gasification unit with the GA EPD which in turn submitted a request to the EPA to provide guidance on how to classify the unit under 40 CFR Part 60, Subpart AAAA regulations. The EPD received a response from Jeananne M. Gettle (Acting Director of Air, Pesticides and Toxic Management Division) in September of 2016. The guidance rendered to the GA EPD was to evaluate the Coaltech Unit as a Pyrolysis / Combustion unit according to criteria used from 40 CFR Subpart Eb (large combustors), which we feel wasn't appropriate for neither our technology nor our application. To note, an EPA Region 3 determination was rendered that Subpart AAAA requirements would not be applicable to a syngas / gasification unit, thus not applicable to the Coaltech gasifier unit design.

Characterizing Synergy's gasifier as a combustion unit would in turn require the unit to be subject to the monitoring requirements of the CAA Standards in Section 129. As a result, if this determination was made, it would render the project economically unfeasible based upon the established plan that had been communicated and understood with various governmental



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stakeholders. Notably, Synergy had previously been awarded a REAP Grant from the USDA to support the installation of the gasification / heat recovery system with the expectation it was understood by all agencies that the gasifier would not be considered as a combustion / incineration technology.

Synergy is continuing its effort to provide information that supports the operation of the unit without being subject to the Subpart AAAA Section 129 monitoring requirements by performing NHSM determination testing. We fully expect that the results of this testing will show that the air emissions produced from gasification of the organic fraction of the treated MSW through our patented Burcell technology process will be a significant positive step forward for the waste industry in managing waste stream recycling and organic landfill diversion in a sustainable and environmentally responsible way. As you are no doubt aware, diversion of the organic fraction of MSW from landfilling is an increasing regulatory requirement throughout the country, and a solution like ours will be of great value to all.

We would appreciate the opportunity to revisit the background with you in more detail to help us finalize the evaluation and set the requirements for how we will operate the gasifier so that we can begin production to demonstrate this beneficial new technology.

Sincerely,

Matt Piell
CEO
Synergy Solutions Crisp County, LP

cc:

Travis Voyles
David Harlow
Blake Ashbee



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